

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEFANO GRANATA, CAMERON PROSPERI,
THE GUNRUNNER LLC, and FIREARMS
POLICY COALITION, INC.

Plaintiffs,

v.

ANDREA JOY CAMPBELL, in her official
capacity as Attorney General of the Commonwealth
of Massachusetts, and TERRENCE M. REIDY, in
his official capacity as Secretary of the Executive
Office of Public Safety and Security of the
Commonwealth of Massachusetts,

Defendants.

CIVIL ACTION
NO. 1:21-cv-10960-DJC

**DEFENDANTS' ASSENTED-TO MOTION
FOR LEAVE TO FILE A MEMORANDUM OF LAW IN EXCESS OF 20 PAGES**

Defendants Andrea Joy Campbell, in her official capacity as Attorney General of the Commonwealth of Massachusetts, and Terrence M. Reidy, in his official capacity as Secretary of the Executive Office of Public Safety and Security of the Commonwealth of Massachusetts, hereby move to file a single memorandum opposing Plaintiffs' motion for summary judgment, and supporting their cross-motion for summary judgment in excess of 20 pages. Specifically, Defendants request leave to file a **28**-page memorandum of law.

As grounds for this motion, Defendants, through undersigned counsel, hereby state that, to limit duplicative or unnecessary briefing, instead of filing a memorandum of up to 20 pages opposing Plaintiffs' motion for summary judgment, and a second memorandum of law supporting Defendants' cross-motion for summary judgment of up to 20 pages, as permitted by D. Mass. Local Rule 7.1(b)(4), Defendants seek to file a single, consolidated 28-page memorandum of law.

Defendants further state that they require additional pages because this case presents a Second Amendment challenge under the new two-part test for evaluating such claims in *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1, 17 (2022). Under this test, courts first must determine whether the challenged firearm regulation is covered by the plain text of the Second Amendment. *Id.* If so, then “[t]o justify its regulation, . . . the government must demonstrate that the regulation is consistent with this Nation’s historical tradition of firearm regulation.” *Id.* In order to set forth and explain the relevant historical tradition of firearm regulation, it is necessary for Defendants to submit a memorandum in excess of 20 pages, but of no more than 28 pages.

In addition, Plaintiffs do not object to the relief requested by this motion.

WHEREFORE, the Defendants respectfully request that this Court grant leave to file a memorandum of law of up to 28 pages.

February 4, 2025

Respectfully submitted,

ANDREA JOY CAMPBELL, in her official capacity as Attorney General of the Commonwealth of Massachusetts, and TERRENCE M. REIDY, in his official capacity as Secretary of the Executive Office of Public Safety and Security of the Commonwealth of Massachusetts,

By their attorneys,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Grace Gohlke
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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred with counsel for Plaintiffs on February 4, 2025, about the relief requested in this motion, and that Plaintiffs do not object to the relief requested in this motion.

/s/ Phoebe Fischer-Groban
Phoebe Fischer-Groban
Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that this document, filed through the Court's ECF, system will be sent electronically to registered participants as identified on the Notice of Electronic Filing on February 4, 2025.

/s/ Grace Gohlke
Grace Gohlke
Assistant Attorney General